

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WESTERN TEXAS
MIDLAND/ODESSA DIVISION**

DANIELLE SPEARS
Plaintiff

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Docket Number: 7:24-cv-321

v.

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NEXT BRIDGE HYDROCARBONS, INC.
GREGORY MCCABE, JOHN BRDA
THE SECURITIES & EXCHANGE COMMISSION
FINANCIAL INDUSTRY REGULATORY AUTHORITY
JANE DOE 1-20, JOHN DO 1-20
Defendant

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**PLAINTIFF, SPEARS UNOPPOSED MOTION TO
EXTEND RESPONSE TO MOTION TO DISMISS**

BY DEFENDANTS NEXT BRIDGE HYDROCARBONS, INC.

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Plaintiff Danielle Spears (hereinafter referred to as “Plaintiff”) and files this motion seeking an extension of her deadline to answer or otherwise respond to Defendants **Next Bridge Hydrocarbons, Inc.** (hereinafter referred to as “Defendants”) Motion to Dismiss (Dkt. 54) and respectfully shows the Court as follows:

1. Plaintiff’s deadline to respond to Defendants Motion to Dismiss is currently set for **July 7, 2025**. The motion raises factual and legal issues that require additional time for proper analysis and response. Plaintiff, proceeding pro se, requests this extension in good faith to

allow her time to thoroughly review and prepare her filing.

2. Defendants are not opposed to this request for extension. Plaintiff respectfully requests a **60-day extension**, setting a new deadline of **August 15, 2025**.
3. This is Plaintiff's first request for an extension regarding this particular motion. The extension is not sought for delay but to ensure a complete and accurate response.
4. Plaintiff conferred with Defendant's counsel, Joshua Frost, on or about June 18, 2025, and counsel indicated that he is not opposed to the requested relief.

Dated: June 21, 2025

Respectfully submitted,

/s/ Danielle Spears

Danielle Spears, Pro Se

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(G), the undersigned hereby certifies that, as pro se Plaintiff, she has conferred with Defendants Next Bridge Hydrocarbons, Inc. counsel Joshua Frost on or about June 18, 2025, by email and counsel indicated he is unopposed to the motion and relief requested.

/s/ Danielle Spears

Danielle Spears

CERTIFICATE OF SERVICE

I certify that I served the foregoing document on all counsel of record via the Court's CM/ECF system on June 21, 2025.

/s/ Danielle Spears

Danielle Spears

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Pending before the Court of pro se Plaintiff Danielle Spears Unopposed Motion to Extend Pleadings Deadline. Upon consideration, the Court finds that the Motion should be, and is hereby **GRANTED**.

Accordingly, it is **ORDERED** that pro se Plaintiff Danielle Spears, may answer or otherwise respond to Defendant Next Bridge Hydrocarbons, Inc. Motion to Dismiss (Dkt. 54) on or before August 15, 2025.

SIGNED this ____ day of _____, 2025.

UNITED STATES DISTRICT JUDGE